

Attorney Docket No. 10559-105001
Application No. 09/458,370
Amendment dated June 30, 2004
Reply to Office Action dated March 31, 2004

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 15 and 19 stand rejected under 35 USC 112, first paragraph, based on errors in the claims as written. Claim 15 has been amended to switch the first and second cosine calculators to obviate this rejection. The Examiner is thanked for his careful consideration of this issue.

The objections to claims 19 and 23 have also been obviated herein by amendment.

Claims 1, 4-8, 11-15, 19-21, 23-25 and 28 stand rejected under 35 USC 102(b) as allegedly being anticipated by Tanaka. This contention remains respectfully traversed. Initially, the Examiner is thanked for carefully explaining his position on pages 2 and 3 of the detailed action. Also, the undersigned meant no disrespect by stating that the interpretation "mixes the different Tanaka embodiments", and apologizes if the statement was taken that way.

In item 4, the Examiner points out the specific interpretation which is used. This interpretation explains how the different DCT calculators in Tanaka read and write the information. Tanaka apparently alternates the directions in

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which the data is written. For example, DCT calculator 4 writes the address 0, 0, column 11, line 24, after which the memory addresses change to 01 (column direction) and the one-dimensional DCT calculator 6 reads data from this address. Subsequently, the results of the DCT calculator 4 are written to the address 0,1 as data. This is summarized in figure 10 where the first reading direction is shown in the column direction, and the second writing direction is shown in the column direction. Thereafter, the row and column address devices are switched. When that happens, the DCT calculator reads in the row direction and vice versa.

Note however, that in the system of Tanaka, there is no provision, and in fact no reasonable way, in which the devices could operate at the same time and in the same direction. Clearly, as the rejection points out, the devices may alternate directions. However, note the way Tanaka describes the operation. First an address is read; see, column 11, lines 18-20. "Then" the data is read; see, column 11, lines 20-22. "Subsequently" the calculated results are written (lines 26-28). The paragraph beginning at column 11, line 58, explains how once one operation is completed, the switching circuits are switched. Column 12 describes how reading with respect to one memory can be performed at the same time his writing during the other

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memory unit. However, these must inherently be going in different directions at the same time. Nowhere is there any teaching or suggestion that the calculators operate simultaneously in a column direction at a first time, and in a row direction at a second time. The DCT calculators are always operating in opposite directions. They do not teach or suggest operating simultaneously in the same direction at the same time, as claimed.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the above amendments and remarks, therefore, all of the claims should be in condition for allowance. A formal notice to that effect is respectfully solicited.

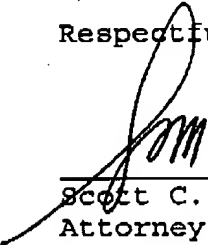
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Respectfully submitted,

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